SNA WAIVER

April 2013

Redacted for Public Inspection

NCTC Seeks

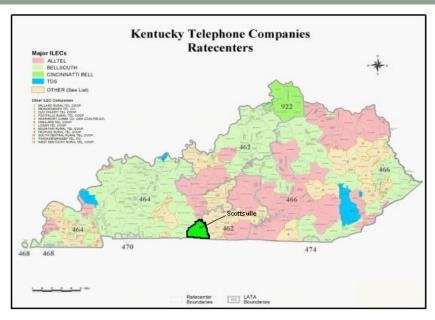
- Reinstatement, nunc pro tunc, of the Safety Net Additive support which would have begun February 2012 but for the rule changes adopted in Commission's Transformation Order
 - NCTC made extensive capital investments in 2010 to upgrade rural plant that qualified it for SNA support without regard to line losses.
 - Investments were an essential piece of a multi-year development plan consistent with The National Broadband Plan
 - Funded by Traditional RUS loan and operating cash flow
 - Elimination of SNA caused NCTC to modify its deployment plans deferring a number of investments which would have:
 - 1. **Resulted in lowering annual operating costs** accelerated removal of aged copper plant lowering annual maintenance costs; efficiency programs leveraging new management system; network monitoring improvements; real time dispatch.
 - 2. Increased broadband availability in very rural areas reduced loop lengths to increase speeds from dial-up to broadband
 - **3. Increased broadband adoption rates** community broadband adoption lab, enterprise services, rural healthcare services, extended community Wi-Fi

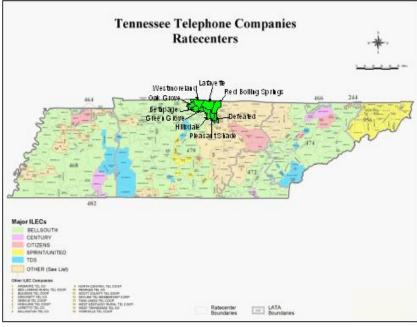
NCTC Operations

- Cooperative organized in 1951 by residents Bell would not serve
- Economically Disadvantaged Area
 - Median income is 65% below national level.
 - 20 25% of persons below the poverty level
 - 7-10% have Bachelor or higher degree (vs. 28% nationally)
 - 10 businesses over 100 employees (Macon/Allen County's)
 - Limited infrastructure 40 miles to interstate / 55 miles to commercial airport
 - Wireless available along state highway corridors & in towns
 - Cable service limited to two main TN population centers









NCTC Subscriber Summary

- Line loss less than vs. 6-8% nationally
 - household penetration
- Internet growing at +
- Video subscribers growing at





NCTC Broadband Plan (See Maps)

- 2008 NCTC began its 21st Century network plan designed to:
 - Bring high speed broadband to the entire rural serving area
 - Reduce cost and improve efficiency
- NCTC's aged copper plant and long loop lengths severely limited internet capabilities
- The hybrid copper/FTTP plan began in Lafayette, Red Boiling Springs, and the northern half of Allen county
- the 2010 ARRA BIP \$49.7M (loan/grant) first round award
 - Six underserved areas (14.8K households or about 73% of serving area)
 - 1,000 mainline fiber miles, fiber drops to 30% of homes passed (5,600)
- Commercial loans & cash flow investment to accelerate network transformation.
 - Class 3 data center, IP network equipment IP softswitch, routers and new management system

NCTC – Data Center & Future Customer Broadband Lab









NCTC Confidential

Network Upgrade - Benefits

 Healthcare – 30 Mbps connection to local Critical Access Hospital to access healthcare professionals for faster/lower cost treatment (Vanderbilt Neurology and Psychology, HCA Tristar Nashville Telemedicine trials)





• Public Safety – EMS – node on 10 Gbps fiber ring plus Hosted VoIP solution



Lafayette Technology Park

- Purchased 2012
- Focused on utilizing NCTC IP infrastructure
- 100 acres
- \$1M investment
- Target high tech service business



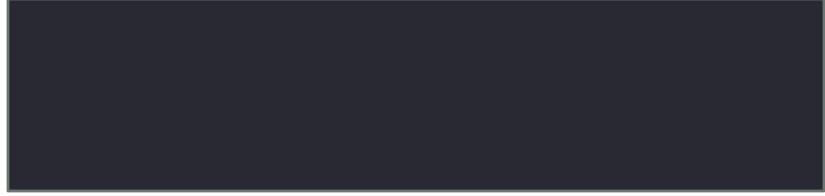
Cost & Efficiency Management

- NCTC has and continues to proactively look for cost reductions and efficiencies to lower operating costs and improve customer service
- Examples:



SNA Waiver – Impacted Programs

Broadband Deployment – Access and Adoption



2. Systems and Business Process Improvements



3. Expansion of Business Services

Summary – Waiver Would Be in Public Interest

- Improved service and lower costs would be consistent with broadband deployment goals of Sec. 254, National Broadband Plan and Transformation Order
- Consistent with established waiver standards, NCTC provided all information required by *Transformation Order*
- No alternative supplier for vast majority of area.
- NCTC's 2010 Investment Made Prior to FCC proposal to eliminate SNA Support
- NCTC qualified for SNA support based on investment not line loss

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